

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE :
 :
TIMOTHY PRESSLER AND :
ARLENE PRESSLER : CHAPTER 13
Debtors :

WILMINGTON SAVINGS FUND :
SOCIETY, FSB, NOT IN ITS :
INDIVIDUAL CAPACITY, BUT :
SOLELY AS INDENTURE TRUSTEE OF :
CITIGROUP MORTGAGE LOAN TRUST :
2017-RP2 :

Movant, :

vs. :

TIMOTHY PRESSLER AND :
ARLENE PRESSLER : CASE NO. 5-13-03995
Respondents. :

DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Arlene Pressler, the Debtor, and files an Answer to Wilmington Savings Fund's Motion for Relief From the Automatic Stay:

1. Arlene Pressler (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor have failed to make post-petition mortgage payments.
3. Debtor believes that not all payments made were credited to the account. Debtor is in the process of obtaining proof of all payments made to the Movant.

4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: July 31, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 31, 2019, he caused a true and correct copy of Debtor's Answer to Wilmington Savings Fund's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Jerome Blank, Esq. at jerome.blank@phelanhallinan.com

Dated: July 31, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire